

March 1, 2024

VIA CM/ECF FILING

The Honorable James Donato
Northern District California
San Francisco Courthouse
450 Golden Gate Avenue, Courtroom 11, 19th Floor
San Francisco, CA 94102

Re: *Klein v. Meta Platforms, Inc.*, No. 3:20-cv-08570-JD (N.D. Cal.)
Joint Stipulation Regarding Class Certification Concurrent Expert Proceeding

Dear Judge Donato:

This letter updates Plaintiffs' request in the Joint Stipulation Regarding Class Certification Concurrent Expert Proceeding (ECF No. 687) that their experts Professor Sarah Lamdan and Mr. Robert Klein be allowed to appear remotely at the March 12, 2024 Class Certification Concurrent Expert Proceeding.

Professor Lamdan (Consumer Plaintiffs' privacy expert, and a critical piece of their class certification motion) has recently undergone emergency surgery. Her doctor has continued to advise against air travel. Professor Lamdan is based in New York.

Plaintiffs previously requested that Mr. Klein be allowed to attend remotely. *See* ECF No. 687, 701. Plaintiffs now withdraw that request. Mr. Klein is available to attend in person.

Plaintiffs have conferred with Facebook's counsel, who have stated they do not oppose the request. Given this good cause, Consumer Plaintiffs respectfully request that the concurrent expert proceedings take place in a hybrid environment, with Professor Lamdan able to attend and interact with the Court and other experts by Zoom. Drs. Economides and Farrell, and Mr. Klein, Consumer Plaintiffs' economist and survey experts, will be attending in person.

DATED: March 1, 2024

Respectfully submitted,

By /s/ Shana Scarlett
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Interim Counsel for the Consumer Class

cc: All counsel of record (*via ECF*)

ATTESTATION OF SHANA E. SCARLETT

This document is being filed through the Electronic Case Filing (ECF) system by attorney Shana E. Scarlett. By her signature, Ms. Scarlett attests that she has obtained concurrence in the filing of this document from each of the attorneys identified on the caption page and in the above signature block.

Dated: March 1, 2024

/s/ Shana Scarlett

Shana E. Scarlett